

Exhibit 4



December 17, 2013

VIA ELECTRONIC MAIL

Sean Carter, Plaintiffs' Executive Committee Co-Chair
Cozen O'Connor
1900 Market Street
Philadelphia, PA 19103-3508

Re: In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (FM)

Dear Sean:

As you know, we represent Defendants Muslim World League (MWL) and International Islamic Relief Organization (IIRO) in the above referenced matter. We were hoping to sit down with members of Plaintiffs' Executive Committee before the hearing on Friday, but I understand that the logistics do not work out for your team, so perhaps we can agree on a date early in the new year. In preparation for that meeting, we write to update Plaintiffs' counsel on the status of efforts by and on behalf of MWL and IIRO to cure certain perceived deficiencies in their document productions as well as to give you an idea of the critical path to completing production on a rolling basis and to seek your consent to a brief extension of the deadline to accommodate the shipping and uploading of documents from abroad.

Document Collection and Productions

Counsel for MWL and IIRO have spent months visiting and collecting additional documents from offices in the Philippines, Indonesia, Bosnia, Albania, Kosovo, Macedonia, Pakistan, Saudi Arabia (Jeddah and Makkah), and Islamabad. All documents in those offices have been reviewed and potentially responsive documents have been designated either for scanning or shipping of hard copies to the United States based upon the technical resources available in that particular venue. The last remaining office to be visited is the Eastern Province office of IIRO, which was shut down by Saudi government officials in 2006. This office is under the control of the KSA Government. We have actively been attempting to gain access through counsel for Saudi Arabia both here and in Saudi Arabia and we anticipate a response in the near term to allow inspection of that office sometime in early January 2014, although obviously this is not within our control. We will keep you apprised of progress on this matter.

Approximately 200,000 pages of potentially responsive documents have been collected or designated from the various locations. MWL and IIRO have added substantial resources in the review of these documents, which are almost exclusively in Arabic. Production of responsive documents began on September 6, 2013, and will continue on a rolling basis until complete. To date, our office has made 5 productions totaling approximately 18,000 pages of responsive material. The productions have included documents collected from the Philippines,



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Indonesia, the Balkans and Saudi Arabia. We are presently uploading to our review database an additional 80,000 pages of documents collected from Bosnia, Indonesia, and Saudi Arabia, which we will produce on a rolling basis over the next few weeks.

Critical Path to Complete Productions

A massive amount of work has been done to gather potentially responsive documents, but with the unique challenges of the production effort in this case – a large volume of potentially responsive materials, predominantly in Arabic, located in numerous, far-flung international offices – some additional time and resources will be needed to complete the production process. MWL and IIRO are committing further additional resources for that purpose.

One complication we have experienced is a number of delays caused by multiple visa applications to several countries as well the logistical issues involved with scanning large volumes of documents in foreign countries without well-developed IT infrastructures. As a result, there has been delay in the receipt of the documents to our office in Washington, D.C. We are awaiting receipt of copies in Washington of a significant portion of the documents designated, numbering approximately 100,000 pages, and current estimates indicate that it will be another few weeks before we receive copies of all documents. As we receive these documents, they are promptly uploaded to a database, which facilitates review and searching. It also permits us to designate to which categories individual documents are responsive.

We intend to continue to produce on a rolling basis, but given that certain documents are not yet received and the need to resolve the position in the Eastern Province, we intend to seek a three (3) month extension of the current deadline of January 14, 2014, which was set by Judge Maas at the June 28th status conference, and we request Plaintiffs' agreement to this request. It is our understanding that the Plaintiffs also intend to seek additional time to complete jurisdictional discovery. Accordingly, we do not believe our request for a few more months to complete IIRO's and MWL's productions will result in a delay in the proceedings or prejudice to any party.

As we previously informed you, it is our intention to address the issues in this case on behalf of our clients in a comprehensive, thorough and professional manner. I trust that the foregoing description of our efforts demonstrates this and that the brief extension will be seen by Plaintiffs, as we are sure it will be seen by the Court, as necessary and appropriate to complete this huge, global exercise and make a comprehensive production in a useful format to facilitate the efficient litigation of these cases.



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Meeting of Counsel for the Parties

Further to our recent communications, we have some availability to meet with Plaintiffs' counsel in January 2014 and look forward to receiving possible dates for our meeting. We also understand that you intend to provide us with a list of concerns that we can discuss at our next meeting and we look forward to working with counsel to resolve any issues that remain.

If you have any questions, please let me know.

Sincerely,

A handwritten signature in black ink, appearing to read "Aisha E. Henry", with a stylized flourish at the end.

Aisha E. Henry

cc: Robert Haefele, Esq.